

February 2, 2018

Sent via U.S. Mail and Electronic Mail

Mr. Matt McClincy
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100

Re: *Follow-up to River Mile 4-7 Group's November 2, 2017 Meeting re NW
Natural/Gasco Site*

Dear Mr. McClincy:

We want to thank you and others at ODEQ for attending the meeting with the River Mile 4-7 Group on November 2, 2017 at EPA's Region 10 offices in Seattle. The Group wishes to reiterate that the existing data indicate that the contamination from the NW Natural/Gasco Site is an ongoing source of polycyclic aromatic hydrocarbons (PAHs) (and potentially other contaminants) to the Willamette River from stormwater, groundwater (including DNAPL – see attached figure) and from the Site's riverbank. For instance, contaminants in stormwater discharges from the NW Natural/Gasco Site have been documented to be up to 390 times higher than the sediment cleanup level required in the remedy articulated in the January 2017 EPA Record of Decision for the Portland Harbor Site. In addition, data presented at the meeting indicate that contamination has migrated from the NW Natural/Gasco Site into sediments located along the river where the River Mile 4-7 Group members' properties are located, at levels above the current cleanup goals.

We are encouraged by and support recent correspondence (August 4, October 19 and 26, 2017) from ODEQ to NW Natural with regard to the inadequacy of NW Natural's Stormwater Control Upland Feasibility Study and its DNAPL monitoring reports. Furthermore, we believe that that:

1. Additional outfall sampling (loading studies) will be necessary to characterize the stormwater control required at the NW Natural/Gasco Site.
2. NW Natural's Hydraulic Containment and Control Groundwater Containment System is ineffective to contain or control DNAPL migration from the NW Natural/Gasco Site and must be replaced with a system/technology demonstrated to be effective at limiting DNAPL migration to the river and river sediments.
3. Any seep meter work in the River should be conducted with the understanding that groundwater movement at the NW Natural/Gasco Site (as identified by DTS work) is not necessarily consistent with areas of DNAPL movement at the Gasco Site, particularly considering the highly heterogeneous stratigraphy of the Site.

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We hope that ODEQ remains committed to addressing the ongoing source control issues at the NW Natural/Gasco Site in an expeditious manner. For the reasons discussed above, the River Mile 4-7 Group intends to comment on future NW Natural/Gasco Site reports and work products. To facilitate this process, the River Mile 4-7 Group respectfully requests to be copied on any relevant future correspondence related to the NW Natural/Gasco Site.

Yours truly,

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Brix Maritime Co.

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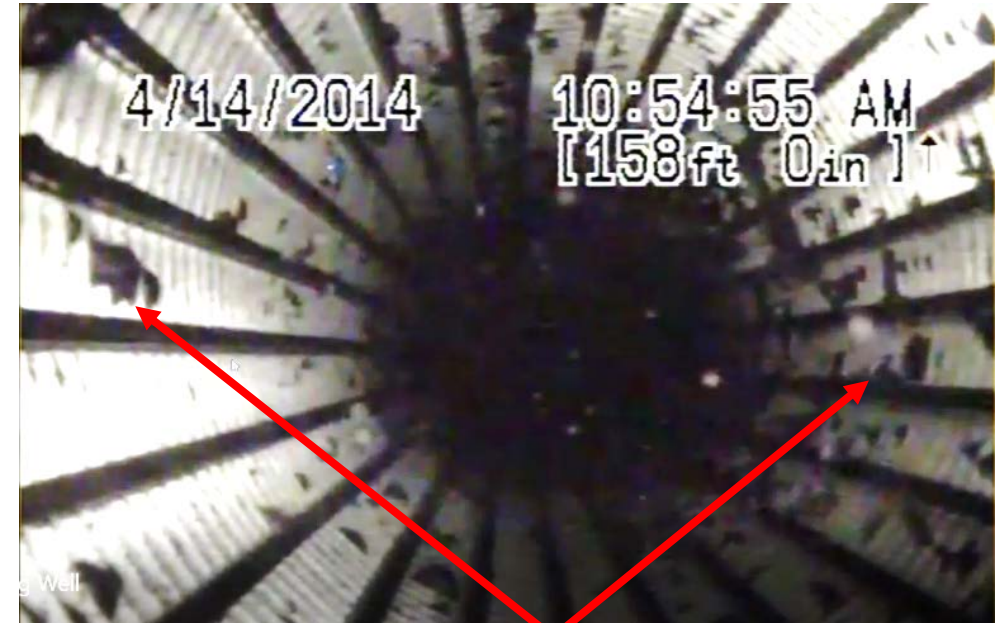
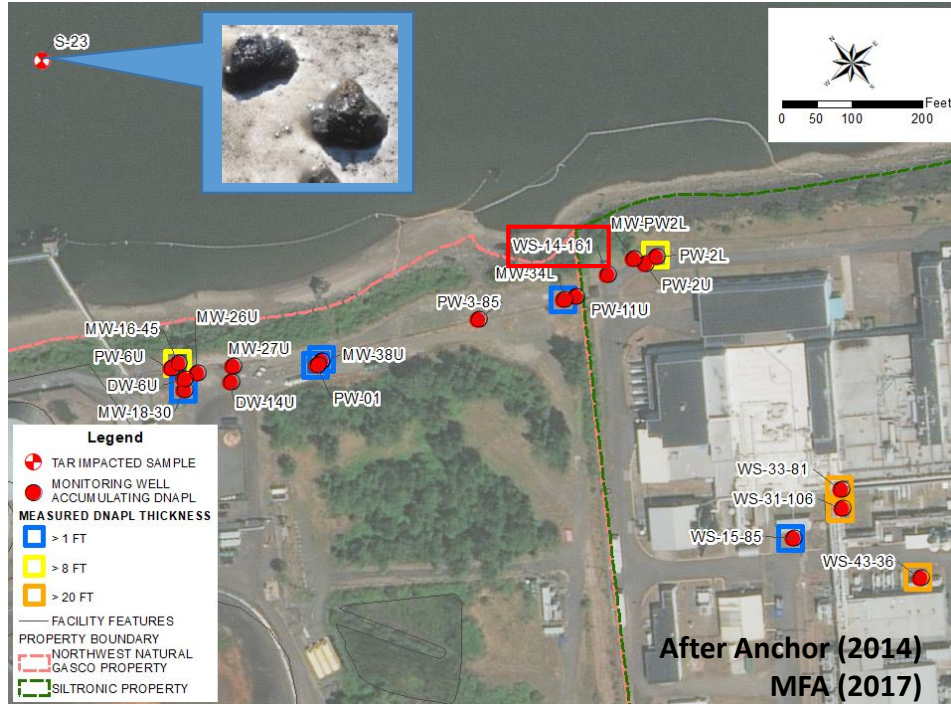
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Attachment: Figure

ATTACHMENT

Mobile DNAPL in Wells – DNAPL Tarballs Offshore



DNAPL Entering Monitoring Well WS-14-161 at 158 ft bgs
(looking down into well bore (note slotted screen))

- Mobile DNAPL is accumulating in wells within 100 feet of the channel
 - DNAPL accumulations occur throughout shoreline profile - from 20 to 160 feet bgs
 - DNAPL thickness: > 8 feet along shoreline; > 20 feet inland
- No data to prove DNAPL migration has stopped
- No data to prove groundwater systems are containing DNAPL migration
- Current observations demonstrate
 - DNAPL migration to River not controlled
 - DNAPL discharges on-going / visually observed